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Attorneys for  
 Teichert Pipelines, Inc. and A. Teichert & Sons, Inc.  
 d/b/a Teichert Aggregates

UNITED STATES BANKRUPTCY COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

and

PACIFIC GAS AND ELECTRIC COMPANY,  
 Debtors.

Case Nos.:

19-30088 (DM) – Lead Case  
 19-30089 (DM)

Chapter 11 Case

**NOTICE OF CONTINUED  
 PERFECTION OF MECHANICS  
 LIEN PURSUANT TO 11 U.S.C. §  
 546(b)(2)**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affect both Debtors

TEICHERT PIPELINES, Inc. ("TEICHERT"), by and through its undersigned counsel, hereby gives notice of continued perfection of its mechanics lien under 11 U.S.C. § 546(b)(2), as follows:

- TEICHERT is a corporation that has provided and delivered labor, services, equipment, and/or materials for a work of improvement located in the County of San Francisco, State of California (the "Property") and owned by PG&E Corporation and/or

1 Pacific Gas and Electric Company (collectively, the "Debtors").

2 2. Through April 23, 2019, the amount owing to TEICHERT is at least  
3 \$925,156.66, exclusive of accruing interest and other charges, with additional amounts owed  
4 and accrued after April 23, 2019.

5 3. Teichert properly perfected its mechanics lien under California Civil Code §§  
6 8400, *et seq.* by timely recording its Mechanics Lien (Claim of Lien) in the Official Records  
7 of San Francisco County, State of California, as more fully described in its Mechanics Lien, a  
8 true copy of which is attached hereto as Exhibit A, on or about April 24, 2019.

9 4. Pursuant to California Civil Code § 8460, an action to enforce a lien must be  
10 commenced within 90 days after recordation of the claim of lien. However, due to the  
11 automatic stay set forth in 11 U.S.C. § 362, TEICHERT is precluded from filing a state court  
12 action to enforce its mechanics lien. 11 U.S.C. § 546(b)(2) provides that when applicable law  
13 requires seizure of property or commencement of an action to perfect, maintain, or continue  
14 the perfection of an interest in property, and the property has not been seized or an action has  
15 not been commenced before the bankruptcy petition date, then the claimant shall instead give  
16 notice within the time fixed by law for seizing the property or commencing an action. (See  
17 11 U.S.C. § 546(b)(2); see also In re Baldwin Builders (Village Nurseries v. Gould), 232 B.R.  
18 406, 410-411 (9<sup>th</sup> Cir. 1999); Village Nurseries v. Greenbaum, 101 Cal.App.4<sup>th</sup> 26, 41 (Cal.  
19 Ct. App. 2002).)

20 5. Accordingly, TEICHERT hereby provides notice of its rights as a perfected  
21 lienholder in the Property pursuant to California's mechanics lien law. TEICHERT is filing  
22 and serving this notice to preserve, perfect, maintain, and continue the perfection of its lien  
23 and its rights in the Property to comply with the requirements of California state law, 11  
24 U.S.C. §§ 362(a), 362(b)(3), and 546(b)(2), and any other applicable law. This notice  
25 constitutes the legal equivalent of having commenced an action to foreclose the lien in the  
26 proper court. By this notice, the Debtors and other parties in interest are estopped from  
27 claiming that the lawsuit to enforce TEICHERT's mechanics lien was not timely commenced  
28 pursuant to applicable state law. TEICHERT intends to enforce its lien rights to the fullest

1 extent permitted by applicable law. The interests perfected, maintained, or continued by  
2 11 U.S.C. § 546(b)(2) extend in and to the proceeds, products, offspring, rents, or profits of  
3 the Property.

4 6. The filing of this notice shall not be construed as an admission that such filing  
5 is required under the Bankruptcy Code, the California mechanics lien law, or any other  
6 applicable law. In addition, TEICHERT does not make any admission of fact or law, and  
7 TEICHERT asserts that its lien is senior to and effective against entities that may have  
8 acquired rights or interests in the Property previously.

9 7. The filing of this notice shall not be deemed to be a waiver of TEICHERT's  
10 right to seek relief from the automatic stay to foreclose its mechanics lien and/or a waiver of  
11 any other rights or defenses.

12 8. TEICHERT reserves all rights, including the right to amend or supplement  
13 this notice.

14  
15 DATED: May 8, 2019

DOWNEY BRAND LLP

16  
17 By: /s/ Jamie P. Dreher  
18 JAMIE P. DREHER  
19 Attorney for  
20 TEICHERT PIPELINES, INC. AND  
21 A. TEICHERT & SONS, INC. D/B/A TEICHERT  
22 AGGREGATES  
23  
24  
25  
26  
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28

# **EXHIBIT A**

RECORDING REQUESTED BY  
REQUESTED BY SCOTT MCELHERN  
WHEN RECORDED MAIL TO

NAME DOWNEY BRAND LLP  
MAILING Scott McElhern  
ADDRESS 621 Capitol Mall, 18th Floor  
Sacramento, CA 95814

PHONE (916) 444-1000  
NUMBER

CONFORMED COPY of document recorded  
on 04/24/2019, 2019K759784  
with document no  
This document has not been compared with the original  
SAN FRANCISCO ASSESSOR-RECORDER

SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

**CLAIM OF MECHANICS LIEN  
(Cal. Civ. Code § 8416)**

1. Teichert Pipelines, Inc. ("Claimant") claims a mechanics lien for the labor, services, equipment and/or materials described in paragraph 2, furnished for a Pacific Gas & Electric Company work of improvement located in the County of San Francisco, State of California, and more particularly described as follows:

Gas distribution main lines and service lines for the locations listed below:

10 Restani Way San Francisco, CA 94112	APN: 7029A-014
1004 Sanchez St. San Francisco, CA 94114	APN: 3653-002
1101 Connecticut St. San Francisco, CA 94107	APN: 4287-076
1140 Harrison St. San Francisco, CA 94103	APN: 3755-023
1240 Filbert St. San Francisco, CA 94109	APN: 0095-007
1290 28th Ave. San Francisco, CA 94122	APN: 1723-029
1301 Turk St. San Francisco, CA 94115	APN: 0756-018
1319 Lyon St. San Francisco, CA 94115	APN: 1082-024
134 Milton St. San Francisco, CA 94112	APN: 6751-006
140 Joost Ave. San Francisco, CA 94131	APN: 6766-053
1406 Bacon St. San Francisco, CA 94134	APN: 5992A-057
1408 Bacon St. # 1. San Francisco, CA 94134	APN: 5992A-069
1427 22nd Ave. San Francisco, CA 94122	APN: 1831-004
145-147 Jersey St. San Francisco, CA 94114	APN: 6536-038
1535 40th Ave. San Francisco, CA 94122	APN: 1886-004B
1546 46th Ave. San Francisco, CA 94122	APN: 1891-035
1608 Dolores St. San Francisco, CA 94110	APN: 6633-003
1686 43rd Ave. San Francisco, CA 94122	APN: 1901-026
1700 Market St. San Francisco, CA 94102	APN: 0855-016
1701 22nd Ave. San Francisco, CA 94122	APN: 2027-001
1709 22nd Ave. San Francisco, CA 94122	APN: 2027-001A
1722 22nd Ave. San Francisco, CA 94122	APN: 2028-023
2 Varela Ave. San Francisco, CA 94132	APN: 7314-001
2005 21st Ave. San Francisco, CA 94116	APN: 2141-001A
2009 21st Ave. San Francisco, CA 94116	APN: 2141-001B
2018 21st Ave. San Francisco, CA 94116	APN: 2140-020
2022 23rd Ave. San Francisco, CA 94116	APN: 2142-024
2034 21st Ave. San Francisco, CA 94116	APN: 2140-016G
207 Los Palms Dr. San Francisco, CA 94127	APN: 3027A-119
2087 23rd Ave. San Francisco, CA 94116	APN: 2143-022

211 Lincoln Blvd. San Francisco, CA 94129	APN: 1300-001
212 27th Street. San Francisco, CA 94131	APN: 6578-009
2155 Funston Ave. San Francisco, CA 94116	APN: 2204-045
2200 Broadway St. San Francisco, CA 94115	APN: 0564-070
2237 Union St. San Francisco, CA 94123	APN: 0539-031
2310 31st Ave. San Francisco, CA 94116	APN: 2359-001K
2346 35th Ave. San Francisco, CA 94116	APN: 2363-030
2351 35th Ave. San Francisco, CA 94116	APN: 2364-052
2378 36th Ave. San Francisco, CA 94116	APN: 2364-028
2426 42nd Ave. San Francisco, CA 94116	APN: 2384-024A
248 Curtis St. San Francisco, CA 94112	APN: 6484-009
250 10th Ave. San Francisco, CA 94118	APN: 1424-025A
250 10th St. San Francisco, CA 94103	APN: 3517-038
2514 23rd Ave. San Francisco, CA 94116	APN: 2423-037
2514 29th Ave. San Francisco, CA 94116	APN: 2429-027
2534 33rd Ave. San Francisco, CA 94116	APN: 2433-024D
2535 33rd Ave. San Francisco, CA 94116	APN: 2434-006
2551 Mission St. San Francisco, CA 94110	APN: 3615-023
2555 20th Ave. San Francisco, CA 94116	APN: 2421-014
280 7th St. San Francisco, CA 94103	APN: 3730-290
2810 Washington St. San Francisco, CA 94115	APN: 0979-011
3 Kezar Dr. San Francisco, CA 94117	APN: 1700-001
30 Otis St. San Francisco, CA 94103	APN: 3505-016
3001 Taraval St. San Francisco, CA 94116	APN: 2385-043A
3040 24th St. San Francisco, CA 94110	APN: 3640-079
307 Niagara Ave. San Francisco, CA 94112	APN: 7027A-001B
31 Uranus Ter. San Francisco, CA 94114	APN: 2654-031
3100 19th Ave. San Francisco, CA 94132	APN: 7228-001
312 Anza St. San Francisco, CA 94118	APN: 1090-010
312 Green St. San Francisco, CA 94133	APN: 0114-016
315 Niagara Ave. San Francisco, CA 94112	APN: 7027A-001C
318 Niagara Ave. San Francisco, CA 94112	APN: 6972-007
319 Niagara Ave. San Francisco, CA 94112	APN: 7027A-001D
324 Niagara Ave. San Francisco, CA 94112	APN: 6972-008
325 Niagara Ave. San Francisco, CA 94112	APN: 7027A-001E
329 Niagara Ave. San Francisco, CA 94112	APN: 7027A-001F
335 Niagara Ave. San Francisco, CA 94112	APN: 7027A-001G
339 Niagara Ave. San Francisco, CA 94112	APN: 7027A-001H
345 Niagara Ave. San Francisco, CA 94112	APN: 7027A-001I
357 Niagara Ave. San Francisco, CA 94112	APN: 7027A-003
363 Niagara Ave. San Francisco, CA 94112	APN: 7027A-004
368 Hill St. San Francisco, CA 94114	APN: 3620-090
369 Niagara Ave. San Francisco, CA 94112	APN: 7027A-005
40 Bernal Heights Blvd. San Francisco, CA 94110	APN: 5640-040
409 Gough St. San Francisco, CA	APN: 0808-063
428 Yale St. San Francisco, CA 94134	APN: 5992A-021
437 Beech Ave. San Francisco, CA 94080	APN: 012-054-020
440 Franconia St. San Francisco, CA 94110	APN: 5634-011
4501 Mission St. San Francisco, CA 94112	APN: 6014-046
490 Clipper St. San Francisco, CA 94114	APN: 6546-024
5133 Geary Blvd. San Francisco, CA	APN: 1529-047
603 Tennessee Street. San Francisco, CA 94107	APN: 3995-015
657 Mission St. San Francisco, CA 94105	APN: 3722-068
670 Mangels Ave. San Francisco, CA 94127	APN: 3066-021
690 5th Ave. San Francisco, CA 94118	APN: 1640-028
701 3rd St. San Francisco, CA 94107	APN: 3794-006

750 N. Goettingen San Francisco, CA 94134	APN: 6125-003
864 Francisco St. San Francisco, CA 94109	APN: 0045-006
901 Tennessee St. San Francisco, CA 94107	APN: 4108-017
907 Innes Ave. San Francisco, CA 94124	APN: 4653-020
932 Wawona St. San Francisco, CA 94116	APN: 2476-027
953 Treat Ave. San Francisco, CA 94110	APN: 3639-028
975 Bryant St. San Francisco, CA 94103	APN: 3780-044
Intersection of Egbert Avenue and Phelps Street, adjacent to	
1886 Egbert Avenue, San Francisco, CA	APN: 5440A-012
2719 Phelps Street, San Francisco, CA	APN: 5440A-026

2. After deducting all just credits and offsets, the sum of \$925,156.66, plus interest accrued and accruing thereon at the maximum legal rate, is due Claimant for the following generally described labor, materials, services, and/or equipment: repairing or replacing existing gas distribution main and service facilities throughout PG&E's service territory, including prospecting, trenching, shoring, excavating, and off hauling of excess material; hauling import material, backfilling, compacting, compaction testing; hauling and handling of gas pipe, fittings, and appurtenances; placing, aligning, joining, and testing of all gas pipe, fittings, and appurtenances; performing tie-ins and cut-offs to existing PG&E gas facilities; installing and testing cathodic protection facilities.

3. Claimant furnished the work and materials at the request of and under contract with Pacific Gas & Electric Company, 77 Beale Street, 32nd Floor, San Francisco, CA 94105.

4. The name and address of the owner or reputed owner of the improvements is Pacific Gas & Electric Company, 77 Beale Street, 32nd Floor, San Francisco, CA 94105.

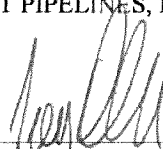
5. Claimant's address is: 3500 American River Drive, Sacramento, CA 95864.

DATED: \_\_\_\_\_

4/23/2019

TEICHERT PIPELINES, INC.

By: \_\_\_\_\_

  
Sean Collins, Credit Manager

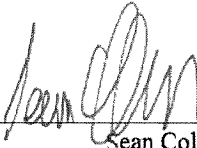
## VERIFICATION

I, Sean Collins, am the Credit Manager for Teichert Pipelines, Inc., and am authorized to make this verification for and on its behalf. I have read the foregoing claim of mechanics lien and know the contents of the claim of mechanics lien to be true of my own knowledge.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATED: 4/23/2019

TEICHERT PIPELINES, INC.

By:   
Sean Collins, Credit Manager



## **NOTICE OF MECHANICS LIEN CLAIM**

### **ATTENTION!**

Upon the recording of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date the mechanics lien is recorded.

The party identified in the enclosed mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanics lien is released.

**BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS' STATE LICENSE BOARD WEB SITE AT [www.clb.ca.gov](http://www.clb.ca.gov).**

## PROOF OF SERVICE AFFIDAVIT

I, Mary Dowd declare:

On April 24, 2019, at Sacramento, California, I served the enclosed:

### CLAIM OF MECHANIC'S LIEN

by enclosing true and correct copies thereof in sealed envelopes, with postage thereon fully prepaid, using one of the following described mailing methods:

- ☐ Registered Mail, Return Receipt Requested;
- ☒ Certified Mail, Return Receipt Requested;
- ☐ Express Mail; or
- ☐ Overnight delivery by an express service carrier.

The envelope was addressed as follows:

Pacific Gas & Electric Company  
77 Beale Street, 32nd Floor  
San Francisco, CA 94105

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Signed on April 24, 2019, at Sacramento, California.



Mary Dowd